

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
V. )  
 )  
JOSEPH SULLIVAN )

Crim. No. 04-30046-MAP

FILED  
IN CLERK'S OFFICE  
2006 AUG 30 P 1:44  
U.S. DISTRICT COURT  
DISTRICT OF MASS.

MOTION OF THE DEFENDANT, JOSEPH SULLIVAN, TO CONTINUE  
SENTENCING

NOW COMES the Defendant, JOSEPH SULLIVAN, in the above-captioned criminal matter and respectfully moves this Honorable Court for an Order continuing the sentencing date presently scheduled for October 11, 2006, and to extend accordingly the present Scheduling Order.

AS REASONS THEREFOR, the defendant, JOSEPH SULLIVAN, through counsel, states that on May 8, 2006, the defendant, JOSEPH SULLIVAN, pled guilty to three counts of the superseding indictment.

SUBSEQUENTLY, counsel did not receive the Governments' statement of relevant facts dated August 16, 2006, until the 17<sup>th</sup> of August, 2006.

SUBSEQUENTLY, the Government served upon defense counsel a thirty-seven page attachment not previously included in any submittals by the Government, which contains, among other things, a list of alleged fraudulent loans processed through the law office of Joseph Sullivan's co-defendant, Albert Innarelli.

IT APPEARS THE Government will argue, somehow, that the defendant, JOSEPH SULLIVAN, is somehow more culpable with regard to the thirty-seven page attachment, concerning relevant conduct for purposes of the advisory sentencing guidelines.

IN ORDER for JOSEPH SULLIVAN to prepare for and respond to adequately, the Government's assertion that he is responsible for any further conduct which is reflected in the attachment and which, appears to be outside the superseding indictment, he must be permitted time to discover and research further information regarding the allegations put forth by the Government concerning the Defendant's relevant conduct.

WHEREFOR, the defendant, JOSEPH SULLIVAN, prays that the said motion be allowed.

THE DEFENDANT,  
JOSEPH SULLIVAN

By: 

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CERTIFICATE OF SERVICE

I, Thomas A. Kokonowski, Esq., hereby certify that a copy of the foregoing had been mailed, first class mail, postage prepaid, this 30<sup>th</sup> day of August, 2006, to:

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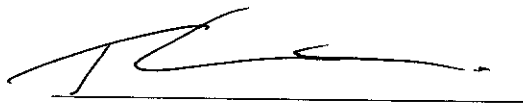
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